

EXHIBIT 2

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Counsel to Lehman Brothers Holdings Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	
Debtors.	:	
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**DECLARATION OF BENJAMIN ODELL IN SUPPORT OF MOTION FOR
SANCTIONS AGAINST WILLIAM KUNTZ III**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

I, Benjamin Odell hereby declare under penalty of perjury:

1. I am an associate with Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Lehman Brothers Holdings Inc. (“LBHI”), movant in the above-captioned action.

2. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 15 is a true and correct copy of an email sent from Mr. Kuntz to myself on February 23, 2016.

3. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 16 is a true and correct copy of an email sent from Mr. Kuntz to myself on February 23, 2016.

4. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 17 is a true and correct copy of an email sent from Mr. Kuntz to myself on February 23, 2016.

5. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 18 is a true and correct copy of an email sent from Mr. Kuntz to myself on February 23, 2016.

6. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 19 is a true and correct copy of an email sent from Mr. Kuntz to myself on February 23, 2016.

7. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 20 is a true and correct copy of an email sent from Mr. Kuntz to myself on February 24, 2016.

8. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 21 is a true and correct copy of an email sent from Mr. Kuntz to myself on February 24, 2016.

9. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 22 is a true and correct copy of an email sent from Mr. Kuntz to myself on February 24, 2016.


10. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 34 is a true and correct copy of an email sent from myself to William Kuntz III on February 25, 2016.

11. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 35 is a true and correct copy of an email sent from myself to William Kuntz III on February 25, 2016.

12. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 36 is a true and correct copy of an email sent from myself to William Kuntz III on February 25, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 4, 2016

A handwritten signature in black ink, appearing to read "B. Odell", is written above a horizontal line.

Benjamin Odell